

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

IN RE:

FREDERICK HUGHES JR.,

Debtor(s).

\*

\*

\*

\*

\*

Chapter 13 Case  
Case No. 16-27154-D

**MOTION TO ADVANCE ONGOING MORTGAGE  
PAYMENTS AND MORTGAGE ARREARAGE PAYMENTS  
AND TO FORGIVE MISSED PAYMENTS**

Come(s) now your Debtor(s), Frederick Hughes Jr., by and through counsel and respectfully states to the Court as follows:

1. The Chapter 13 case was filed on August 08, 2016.
2. Debtor(s) petition(s) the Court to advance ongoing mortgage payments and mortgage arrearage payments to Rushmore Loan Management Services for three (3) months and to forgive missed payments for three (3) months.

WHEREFORE, PREMISES CONSIDERED, your Debtor(s) petition(s) the Court for the relief as set out above and that the Debtor(s) be granted such other and further relief to which he may be entitled.

Respectfully submitted,  
LONG, UMSTED & JONES

By: /s/Michael J. Baloga  
Attorney for Debtor(s)  
314 Poplar Avenue  
Memphis, Tennessee 38103  
Phone: (901) 522-9316

CERTIFICATE OF SERVICE

I certify that copies of this document were sent to the following by U.S. Mail and/or email on January 30, 2018.

/s/Michael J. Baloga

Debtor(s)  
Trustee  
All entities on matrix